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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Curtis Christopher Lee Jones,  
Plaintiff,

vs.

Kilolo Kijakazi, Acting  
Commissioner of Social Security,  
Defendant.

Case No. 1:20-cv-01488-EPG

STIPULATION AND ORDER FOR  
EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from September 17, 2021 to October 17, 2021, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time but first for this task. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week. Counsel has due two Reply Briefs, two Motions for Summary Judgment, four Opening Briefs, one Plaintiff's Memorandum, and one Plaintiff's Portion of Joint Submission

1 due the same week. Counsel requires additional time to brief the issues thoroughly for the  
2 Court's consideration.

3 Counsel has recently received a greater number of Answers and Certified Administrative  
4 Records from defendant in cases in this district, and the three other California Districts, each of  
5 which require settlement negotiations or merit briefing. Counsel has a greater than usual number  
6 of merit briefs due in September 2021. Thus, Counsel is requesting an extension into October  
7 2021 to accommodate the number of cases due in September 2021. Also, Counsel is in the process  
8 of increasing support staff to accommodate the increase in the number of cases at the briefing  
9 stage.

10 Defendant does not oppose the requested extension. Counsel apologizes to the Defendant  
11 and Court for any inconvenience this may cause.

12  
13 Respectfully submitted,

14 Dated: September 9, 2021 PENA & BROMBERG, ATTORNEYS AT LAW

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16 By: /s/ Dolly M. Trompeter  
17 DOLLY M. TROMPETER  
18 Attorneys for Plaintiff

19 Dated: September 9, 2021 PHILLIP A. TALBERT  
20 Acting United States Attorney  
21 DEBORAH LEE STACHEL  
22 Regional Chief Counsel, Region IX  
23 Social Security Administration

24 By: \*/s/ Chantal Jenkins  
25 Chantal Jenkins  
26 Special Assistant United States Attorney  
27 Attorneys for Defendant  
28 (\*As authorized by email on September 9, 2021)

**ORDER**

Pursuant to the stipulation of the parties (ECF No. 19), IT IS HEREBY ORDERED that Plaintiff shall file and serve an opening brief no later than October 17, 2021. All subsequent deadlines are extended accordingly.

IT IS SO ORDERED.

Dated: **September 10, 2021**

/s/ Eric P. Groj  
UNITED STATES MAGISTRATE JUDGE